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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNION HOME MORTGAGE CORP., )

Plaintiff, )

v. )

EMM LOANS, LLC, )

Defendant. )

Case No.:

1:23-cv-21804-KMW-AMD

Judge Karen M. Williams

**JOINT STATUS REPORT**

Pursuant to the Court's May 9, 2024, Text Order (D.I. 23), the parties submit this joint status report. The parties are conducting written discovery and have not

yet noticed or taken depositions in this proceeding, although there have been depositions taken in a related case, *Union Home Mortgage Corp. v. Christopher Fratelli*, Cause No. 1:23-cv-00857, including this week.

The parties have met and conferred regarding a variety of document collection and production issues in this case and are working together to resolve those issues. The parties anticipate that they will need an additional 90 days, until August 29, 2024, to complete fact discovery, including depositions, and respectfully request that the Court extend fact discovery accordingly.

Respectfully submitted,

Dated: May 23, 2024

BARNES & THORNBURG LLP

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**CERTIFICATE OF SERVICE**

I, Regina S.E. Murphy, hereby certify that on this 23rd day of May 2024, a copy of the foregoing *Joint Status Report* was served on counsel of record via email and the Court's e-filing system as follows:

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/s/ Regina S.E. Murphy  
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